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July 20, 2010

The Honorable I. Leo Glasser  
United States District Court  
- Eastern District of New York  
225 Camden Plaza East  
New York, NY 11201

Re: **United States v. Doe,**  
**Criminal Docket No. 98 CR 1101 (ILG)**

Dear Judge Glasser:

During oral argument on June 21, 2010 the Court observed that the movant did not direct its motion to the conduct of Messrs Jody Kriss and Michael Ejekam. The Court also acknowledged that it did not expect a written submission from those non-party respondents in response to any papers filed by movant. (See 6-21-2010 Tr. at 116:6-7 – “Mr. Stamoulis, I don’t think you have a dog in this fight.”) Consequently, non-party respondents Kriss and Ejekam did not submit a response to the pleadings filed by movant.

Accordingly, undersigned counsel does not intend to attend the oral argument scheduled for today and advised counsel for movant of his intentions. To the extent the Court is interested, the position of both Kriss and Ejekam is that the totality of the facts put forth before the Court do not support the grant of the permanent injunction sought by movant. Further, Kriss and Ejekam object to any relief sought in movant’s papers that exceeds what was specified in the original Order to Show Cause. Kriss and Ejekam do not consent to any restrictions being placed on the use or dissemination of any information derived from the sealed documents or copies thereof. If the Court is considering granting any relief beyond that sought in the Order to Show Cause, Kriss and Ejekam request the opportunity to submit a formal response to movant’s papers.

Finally, undersigned counsel provided contact information to movant’s counsel and will be available telephonically should the Court desire counsel’s participation.

Respectfully submitted,

Stamatios Stamoulis (SS7949)  
of Stamoulis & Weinblatt LLC

cc: Kelly Moore, Esq. (via e-mail)  
Richard Lerner, Esq. (via e-mail)

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